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F. #2019R

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

- against -

DEMETRIOUS BOUDOURAKIS,

Defendant.
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FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ JUN 14 2019 ★

LONG ISLAND OFFICE

COMPLAINT AND
AFFIDAVIT IN SUPPORT
OF ARREST WARRANT

(18 U.S.C. § 922(g)(1); 21 U.S.C. § 846)

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EASTERN DISTRICT OF NEW YORK, SS:

SCOTT KNOX, being duly sworn, deposes and states that he is a Special Agent with the Drug Enforcement Administration, duly appointed according to law and acting as such.

On or about June 11, 2019, within the Eastern District of New York and elsewhere, the defendant DEMETRIOUS BOUDOURAKIS, knowing that he had been previously been convicted in a court of a crime punishable by a term of imprisonment exceeding one year, did knowingly and intentionally possess in and affecting commerce firearms, to wit: a Glock .45 caliber handgun and a loaded Smith and Wesson .357 magnum revolver.

(Title 18, United States Code, Section 922(g)(1))

On or about and between September 2017 and June 11, 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant DEMETRIOUS BOUDOURAKIS, together with others, did knowingly and

intentionally conspire to distribute and possess with intent to distribute controlled substances, which offense involved a substance containing ten grams of more of an analogue of fentanyl, to wit: cyclopropyl fentanyl, and a substance containing ten grams or more of another analogue of fentanyl, to wit: 2-furanylbenzyl fentanyl, contrary to Title 21, United States Code, Sections 841(a)(1) and 846.

(Title 21, United States Code, Sections 846 and 841(b)(1)(b)(vi))

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with the Drug Enforcement Administration ("DEA") and have been since 1996. I have participated in numerous investigations involving the trafficking of narcotics, including heroin, narcotic pain pills, fentanyl and fentanyl analogues. Through my training and experience – which has included debriefing numerous cooperating drug traffickers, conducting numerous searches of locations where drugs and drug proceeds have been found and conducting surveillance of individuals engaged in drug trafficking – I have become familiar with the manner in which illegal drugs are distributed, the method of payment for such drugs and the efforts of persons involved in such activity to avoid detection by law enforcement. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

law enforcement officers involved in the investigation. I am also familiar with drug traffickers' use of "tools of the trade," including firearms.

2. In or about September 2018, the DEA initiated an investigation into fentanyl analogue trafficking by the defendant DEMETRIOUS BOUDOURAKIS and other coconspirators in Suffolk County. According to a confidential source ("CS-1")², in or about September 2017, BOUDOURAKIS and CS-1, together with others, began using a pill press inside BOUDOURAKIS's place of business³ in Melville, New York to press fentanyl and/or fentanyl analogue and a cutting agent into tens of thousands of fake oxycodone pills for distribution. CS-1 also stated that in that same timeframe, CS-1 sold BOUDOURAKIS a .45 caliber Glock handgun for \$700, which transaction also occurred inside BOUDOURAKIS's place of business. CS-1 also stated that BOUDOURAKIS also purchased a .357 magnum revolver from CS-1, although CS-1 could not recall when that transaction occurred.

3. In or about May 2019, CS-1 met with the defendant DEMETRIOUS BOUDOURAKIS in Seaford, New York, which was the new location of BOUDOURAKIS's place of business. BOUDOURAKIS provided CS-1 with a quantity of the fentanyl analogue powder that was unused from the pill pressing operation and also indicated that the pill press used in the operation was located in a storage facility.

² The information provided by CS-1, who has proven reliable, has been corroborated by other evidence.

³ On or about June 11, 2019, BOUDOURAKIS and others were charged in Suffolk County with participating in an advanced fee loan fraud scheme that stole at least \$2 million from his numerous victims over the past few years.

4. According to another confidential source (“CS-2”)⁴, in or about September 2017, CS-1 contacted CS-2 to arrange for the delivery of the pill press to the defendant DEMETRIOUS BOUDOURAKIS’s then place of business in Melville, New York. CS-2 stated that he delivered the pill press to BOUDOURAKIS’s business and that CS-1 indicated that BOUDOURAKIS had previously been incarcerated for armed robbery. CS-2 further stated that subsequent to the delivery of the pill press, CS-2 purchased hundreds of fake oxycodone pills from CS-1 in the parking lot of BOUDOURAKIS’s business in Melville, New York. Some of these pills were obtained by the DEA and tested positive for the presence of an analogue of fentanyl, to wit: cyclopropyl fentanyl, with a total pill weight that exceeded ten grams. Additional pills obtained by the DEA tested positive for the presence of another analogue of fentanyl, to wit: 2-furanylbenzyl fentanyl, with a total pill weight that exceeded ten grams.

5. On or about June 11, 2019, the defendant DEMETRIOUS BOUDOURAKIS was arrested pursuant to a state arrest warrant inside his residence located in Farmingdale, New York. During the execution of a search warrant of that residence, law enforcement recovered a Glock .45 caliber handgun and a loaded Smith and Wesson .357 magnum revolver. On or about December 19, 2000, BOUDOURAKIS pleaded guilty to felony Hobbs Act robbery in the Eastern District of New York and was sentenced, on or about June 20, 2003, to a term of imprisonment of 63 months.

6. On or about June 12, 2019, a state search warrant was executed at a self-storage facility located in Farmingdale, New York. Inside the storage unit, among other

⁴ The information provided by CS-2, who has proven reliable, has been corroborated by other evidence.

things, was a pill press covered in powdery residue, pressing dies used to shape pills, and an invoice for a cutting agent used to manufacture pills. The address on the invoice was for the defendant DEMETRIOUS BOUDOURAKIS's place of business in Melville, New York. The invoice also indicated that the recipient of the order was BOUDOURAKIS.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued for the defendant DEMETRIOUS BOUDOURAKIS, so that he may be dealt with according to law.



SCOTT KNOX
Special Agent, Drug Enforcement Administration

Sworn to before me this
14th day of June, 2019

/S/ STEVEN I. LOCKE

THE HONORABLE STEVEN I. LOCKE
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK